

**Annual 47 C.F.R. § 64.2009(e) CPNI Certification**

**EB Docket 06-36**

Annual 64.2009(e) CPNI Certification for 2019 covering the prior calendar year 2018

1. Date filed: February, 2019
2. Name of company covered by this certification: Dubois Telephone Exchange, Inc.
3. Form 499 Filer ID: 802131
4. Name of signatory: Michael J. Kenney
5. Title of signatory: Vice President and General Manager
6. Certification:

I, Michael J. Kenney, certify that I am an officer of the company named above ("DTE"), and acting as an agent of DTE, that I have personal knowledge that DTE has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. *See* 47 C.F.R. § 64.2001 *et seq.*

Attached to this certification is an accompanying statement explaining how DTE's procedures ensure that it is in compliance with the requirements (including those mandating the adoption of CPNI procedures, training, recordkeeping, and supervisory review) set forth in section 64.2001 *et seq.* of the Commission's rules.

DTE has not taken any actions (proceedings instituted or petitions filed by the company at either state commissions, the court system, or at the Commission) against data brokers in the past year. DTE does not have any information with respect to the processes pretexters are using to attempt to access CPNI.

DTE has not received any customer complaints in the past year concerning the unauthorized release of CPNI.

DTE represents and warrants that the above certification is consistent with 47 C.F.R. § 1.17 which requires truthful and accurate statements to the Commission. DTE also acknowledges that false statements and misrepresentations to the Commission are punishable under Title 18 of the U.S. Code and may subject it to enforcement action.

Signed



Date

02/06/2019

**Attachments:**

Accompanying Statement Explaining CPNI Procedures

### **Accompanying Statement Explaining CPNI Procedures**

Pursuant to Section 64.2009(e) of the Federal Communications Commission's ("FCC") rules, this statement explains how the operating procedures of Dubois Telephone Exchange, Inc. ("the Company") ensure compliance with Part 64, Subpart U of the FCC's rules.

The Company has chosen to prohibit the use of CPNI for marketing purposes, except when attempting to winback former customers as allowed by the FCC in its September 3, 1999 Order on Reconsideration and Petitions for Forbearance in CC Dockets 96-115 and 96-149 (FCC 99-223).

The Company's CPNI Policy Manual includes an explanation of what CPNI is and when it may be used without customer approval.

Employees with access to CPNI have been trained as to when they are and are not authorized to use CPNI. The Company's CPNI Policy Manual describes the disciplinary process related to noncompliance with CPNI obligations, and sets forth the penalties for non-compliance, which can include termination of employment.

The Company has established a supervisory review process regarding the Company compliance with the FCC's CPNI rules.

The Company requires affirmative written subscriber approval for the release of CPNI to third parties.

A CPNI Compliance Officer has been appointed for the Company and a Corporate Officer is held responsible for annually certifying that the Company is in compliance with the FCC's CPNI rules and submitting the certification and an accompanying statement explaining how the Company complies with the FCC's CPNI rules to the FCC prior to March 1.

### **Company Safeguards**

The Company takes reasonable measures to discover and protect against attempts to gain unauthorized access to CPNI. The Company has safeguards in place to protect against unauthorized access to CPNI. The Company authenticates a customer prior to disclosing CPNI based on customer initiated telephone contact or an in-store visit.

The Company only discloses call detail information over the telephone, based on customer-initiated telephone contact, if the customer first provides a password that is not prompted by the carrier asking for readily available biographical information or account information. If a customer does not provide a password, the Company only discloses call detail information by sending it to an address of record or by calling the customer at the telephone number of record. If the customer is able to provide call detail information during a customer-initiated call without the Company's assistance, then the Company is permitted to discuss the call detail information provided by the customer.

The Company has established a system of passwords and password protection. For a new customer, the Company requests that the customer establish a password at the time of service initiation. For existing customers to establish a password, the Company must first authenticate the customer without the use of readily available biographical information or account information. The Company authenticates a customer using non-public information such as calling the customer at the telephone number of record.

For accounts that are password protected, the Company cannot obtain the password by asking for readily available biographical information or account information to prompt the customer for his password. If a password is forgotten or lost, the Company uses a backup customer authentication method that is not based on readily available biographical information or account information.

If a customer does not want to establish a password, the customer may still access call detail based on a customer-initiated telephone call, by asking the Company to send the call detail information to an address of record or by the carrier calling the telephone number of record.

The Company provides customers with access to CPNI at the carrier's retail location if the customer presents a valid photo ID and the valid photo ID matches the name on the account.

The Company has procedures and policies in place to notify a customer immediately when a password, customer response to a back-up means of authentication for lost or forgotten passwords, or address of record is created or changed.

In the event of a CPNI breach, the Company complies with the FCC's rules regarding notice to law enforcement and customers. The Company maintains records of any discovered breaches and notifications to the United States Secret Service (USSS) and the FBI regarding those breaches, as well as the USSS and the FBI responses to the notifications for a period of at least two year.

**Actions Taken Against Data Brokers and Customer Complaints**

The Company has taken no actions against data brokers in the last year. The Company has received no customer complaints in the past year concerning the unauthorized release of CPNI.

Signed



Date

02/06/2019